

## REMARKS

Please cancel Claim 16 without prejudice. Claims 1-15 and 17-32 are pending. Claims 4, 15, 17, 27 and 28 are amended herein.

### 112 Rejections

Claims 15 and 27 are rejected under 35 U.S.C. § 112, second paragraph, because of a lack of antecedent basis in the claims. Claims 15 and 27 are amended herein to correct the cited deficiency, and therefore the requirements of 35 U.S.C. § 112, second paragraph, are now satisfied.

### 102 Rejections

Claims 1-2 and 4-9 are rejected under 35 U.S.C. § 102(e) as being anticipated by Brown et al. ("Brown;" US 5,875,446). The Applicant has reviewed the cited reference and respectfully submits that the present invention as recited in Claims 1-2 and 4-9 is not anticipated nor rendered obvious by Brown.

The Examiner is respectfully directed to Claim 1, which recites that an embodiment of the present invention is directed to a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier, "wherein said unique object identifier is unique." The Examiner is also respectfully directed to Claim 4 dependent on Claim 1, which recites that the method of Claim 1 "further comprises the step of including in said unique object identifier a unique identification number, said unique identification number assigned only to said mass storage unit such that said unique object identifier is unique for all mass storage devices."

"Unique," as commonly used, refers to "being the only one of its kind," for example. The instant specification, beginning at line 20 on page 18 and continuing through line 19 on page 19, states in part that, in one embodiment, "each object identifier on HDD unit 60 is unique not just for that HDD unit but it is also unique for all units" (emphasis added).

Applicant respectfully submits that Brown does not show or suggest an object identifier that is the only one of its kind, as recited by Claim 1. Although Brown recites "a unique identifier," there is no showing or suggestion in Brown that the object identifier of Brown is truly unique.

In addition, Applicant respectfully submits that Brown does not show or suggest that the unique object identifier of Claim 1 includes a unique identification number that is assigned only to the mass storage unit as recited in Claim 4. Applicant did not find Brown to show or suggest how the object identifier is made to be unique, nor did Applicant find Brown to show or suggest what constitutes an object identifier. Accordingly, Applicant respectfully submits that Brown does not show or suggest either a unique identification number assigned to a mass storage unit, nor does Brown show or suggest including such a unique identification number in the unique object identifier.

In summary, Applicant respectfully submits that Brown does not show or suggest the present claimed invention as recited by independent Claim 1. Therefore, Applicant respectfully submits that the basis for rejecting Claim 1 under 35 U.S.C. § 102(e) is traversed and that Claim 1 is in condition for

allowance. As such, Applicant respectfully submits that the basis for rejecting Claims 2 and 4-9 under 35 U.S.C. § 102(e) is also traversed as these claims are dependent on an allowable base claim and recite additional limitations. Accordingly, Applicant respectfully submits that Claims 2 and 4-9 are also in condition for allowance.

#### 103(a) Rejections

Claims 10-13, 15, 17-27 and 29-32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Taira (US 6,415,098). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 10-13, 15, 17-27 and 29-32 is not anticipated nor rendered obvious by Brown and Taira, alone or in combination.

Applicant respectfully directs the Examiner to independent Claims 1, 15 and 27. Claims 10-13 are dependent on Claim 1, Claims 17-26 are dependent on Claim 15, and Claims 29-32 are dependent on Claim 27.

Independent Claim 1 recites that an embodiment of the present invention is directed to a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier, "wherein said unique object identifier is unique." Independent Claim 15 recites that an embodiment of the present invention is directed to a mass storage unit comprising a microcontroller used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique to said mass storage unit and across all mass storage units." Independent Claim 27 recites that an embodiment of the

present invention is directed to a mass storage unit comprising a microcontroller means used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique to said mass storage unit and across all mass storage units."

As presented above, Applicant respectfully submits that Brown does not show or suggest the present invention as recited by Claim 1.

Regarding Claims 15 and 27, Applicant respectfully submits that Brown does not show or suggest a unique object identifier that is unique across all mass storage units. Although Brown recites "a unique identifier," there is no showing or suggestion in Brown that the object identifier of Brown is truly unique, and in particular is unique across all mass storage units.

In addition, Applicant respectfully submits that Brown does not show or suggest that the unique object identifier of Claims 15 and 27 include a unique identification number that is assigned only to the mass storage unit, as recited in Claims 17 and 28. Applicant did not find Brown to show or suggest how the object identifier is made to be unique, nor did Applicant find Brown to show or suggest what constitutes an object identifier. Accordingly, Applicant respectfully submits that Brown does not show or suggest either a unique identification number assigned to a mass storage unit, nor does Brown show or suggest including such a unique identification number in the unique object identifier.

Applicant respectfully submits that Taira does not overcome the shortcomings of Brown. Applicant understands Taira to describe the storing of

title screen data, for example, in a file that is assigned a certain name. Other such files are also used to store other types of data and are assigned names based on the type of data being stored. That is, Applicant understands Taira to only describe naming files based on the content of the files. As such files and the naming scheme described by Taira are used from one system to the next, Applicant respectfully submits that the file names described by Taira are not unique as recited in independent Claims 1, 15 and 27, and in particular are not unique across all mass storage devices as recited in independent Claims 15 and 27.

Thus, Applicant respectfully submits that Brown and Taira, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1, 15 and 27, and that these claims are in condition for allowance.

Furthermore, Applicant respectfully submits that Taira, alone or in combination with Brown, does not show or suggest that the unique object identifier of Claims 15 and 27 includes a unique identification number that is assigned only to the mass storage unit, as recited in Claims 17 and 28. Taira, alone or in combination with Brown, does not show or suggest either a unique identification number assigned to a mass storage unit or including such a unique identification number in the unique object identifier.

In summary, Applicant respectfully submits that Brown and Taira, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1, 15 and 27 and that these claims are in condition for

allowance. As such, Applicant respectfully submits that Brown and Taira, alone or in combination, also do not show or suggest the present claimed invention as recited by Claims 10-13 dependent on Claim 1, Claims 17-26 dependent on Claim 15, and Claims 29-32 dependent on Claim 27, as Claims 10-13, 17-26 and 29-32 are dependent on allowable base claims and recite additional limitations. Therefore, Applicant respectfully submits that the basis for rejecting Claims 10-13, 15, 17-27 and 29-32 under 35 U.S.C. § 103(a) is traversed.

Claims 3 and 14 rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Hoover et al. ("Hoover" US 5,724,575). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 3 and 14 is not anticipated nor rendered obvious by Brown and Hoover, alone or in combination.

Claims 3 and 14 are dependent on independent Claim 1. As described above, Applicant respectfully submits that Brown does not show or suggest the present claimed invention as recited by Claim 1.

Applicant respectfully submits that Hoover does not overcome the shortcomings of Brown. Applicant understands Hoover to describe object identifiers that persist over time. However, Applicant respectfully submits that Hoover, alone or in combination with Brown, does not show or suggest an object identifier that is the only one of its kind, as recited by Claim 1. Although Hoover recites "a unique identifier," there is no showing or suggestion in Hoover that the object identifier of Hoover is truly unique.

Furthermore, regarding Claim 3, Applicant respectfully agrees with the statement in the instant Office Action that Brown does not disclose including in the unique object identifier a date and time corresponding to when the unique object identifier is derived. Applicant respectfully submits that Hoover does not overcome the shortcomings of Brown in this respect. Specifically, Applicant respectfully submits that Hoover, alone or in combination with Brown, does not show or suggest "including in said unique object identifier a date and time corresponding to when said unique object identifier is derived" as recited in Claim 3. Figure 7 of Hoover very clearly shows the object identifier of Hoover as being an entity that is separate and distinct from the status information (e.g., the date), whereas the present claimed invention recites that the date and time are included in the object identifier. Applicant respectfully submits that updating a table that contains an object identifier and a date as separate entities cannot be read as including a date and time in an object identifier, as recited by Claim 3.

In summary, Applicant respectfully submits that Brown and Hoover, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claim 1, and that Claim 1 is in condition for allowance. As such, Applicant respectfully submits that Brown and Hoover, alone or in combination, also do not show or suggest the present claimed invention as recited by Claims 3 and 14 dependent on Claim 1, as Claims 3 and 14 are dependent on an allowable base claim and recite additional limitations. Therefore, Applicant respectfully submits that the basis for rejecting Claims 3 and 4 under 35 U.S.C. § 103(a) is traversed.

Claim 28 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Taira and further in view of Hoover. The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claim 28 is not anticipated nor rendered obvious by Brown, Taira and Hoover, alone or in combination.

Claim 28 is dependent on independent Claim 27. As presented above, Applicant respectfully submits that Brown and Taira, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claim 27.

Applicant respectfully submits that Hoover does not overcome the shortcomings of Brown and Taira. Hoover, alone or in combination with Brown and Taira, also does not show or suggest a unique object identifier that is unique across all mass storage units. Accordingly, Applicant respectfully submits that Brown, Taira and Hoover, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claim 27 and that Claim 27 is in condition for allowance. Therefore, Applicant respectfully submits that Brown, Taira and Hoover (alone or in combination) also do not show or suggest the additional claimed features of the present invention as recited in Claim 28 and that Claim 28 is in condition for allowance as being dependent on an allowable base claim. Therefore, Applicant respectfully submits that the basis for rejecting Claim 28 under 35 U.S.C. § 103(a) is traversed.



### Conclusions

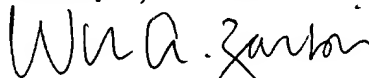
In light of the above remarks, Applicant respectfully requests reconsideration of the rejected Claims.

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-15 and 17-32 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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